

Robert C. Patrick  
Federal Transit Administration, Region 6  
819 Taylor Street, Room 8A36  
Fort Worth, TX 76102

Dear Mr. Patrick:

In accordance with the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, Environmental Protection Agency (EPA) Region 6 has reviewed the Draft Environmental Impact Statement (DEIS) for the proposed construction of transportation improvements in the Denton to Carrollton Regional Rail corridor to serve the cities of Carrollton, Lewisville, Highland Village, Hickory Creek, Lake Dallas, Corinth and Denton in Dallas and Denton Counties, Texas.

EPA rates the DEIS as "EC-2," i.e., EPA has "**Environmental Concerns and Requests Additional Information in the Final EIS (FEIS).**" EPA has identified environmental concerns and informational needs to be included in the FEIS to complement and to more fully insure compliance with the requirements of NEPA and the CEQ regulations. Areas requiring additional information or clarification include: wetlands and air quality impacts.

Our classification will be published in the Federal Register according to our responsibility under Section 309 of the Clean Air Act to inform the public of our views on proposed Federal actions. Detailed comments are enclosed with this letter, which more clearly identify our concerns and the informational needs requested for incorporation into the FEIS. If you have any questions or wish to meet to discuss these comments further, please contact Mike Jansky of my staff at (214) 665-7451 for assistance.

EPA appreciates the opportunity to review the DEIS. Please send our office five copies of the FEIS when it is sent to the Office of Federal Activities, EPA (Mail Code 2252A), Ariel Rios Federal Building, 1200 Pennsylvania Ave, N.W., Washington, DC 20004.

Sincerely yours,

Cathy Gilmore, Chief  
Office of Planning and  
Coordination (6EN-XP)

Enclosure

bcc: Peggy Wade (6PD)  
Richard Prather (6WQ)  
6ENXP:JANSKY:mj:091907:FTA DENTON TO CAROLLTON REG. RAIL DEIS

**DETAILED COMMENTS  
ON THE  
DRAFT ENVIRONMENTAL IMPACT STATEMENT  
FOR THE  
DENTON TO CARROLLTON REGIONAL RAIL CORRIDOR PROJECT**

**AIR COMMENTS**

1. Page 3-108, near the top of the page, please change the last sentence of the paragraph to read: "One year after the effective date of designating attainment and nonattainment areas for the 8-hour standard, EPA revoked the 1-hour standard."
2. Please check all references to the 2006-2008 TIP and Mobility 2025 MTP, and update them with the current transportation documents which are the 2008 -2011 TIP and the Mobility 2030 MTP. These two new documents were found by FHWA to be in conformity with the State Implementation Plan for air quality on June 12, 2007.
3. Page 3-113, Section 3.11.6, first sentence. EPA disagrees with the first sentence under this section, "Transportation currently contributes to only four of the criteria pollutants..." We suggest this sentence be removed altogether, as small emission of lead are possible from brake dust, and there are some sulfur emissions even with the new low-sulfur motor fuels available.

**WETLAND COMMENTS**

The EIS states that approximately 4,270.85 linear feet of stream channel and approximately 9.58 acres of wetlands would be directly impacts by the proposed project. However, no estimates were made as to the extent of secondary and temporary impacts by the project. Prior to the application for a Section 404 permit, EPA requests that the applicant provide an evaluation of all impacts to aquatic resources. Consideration of impacts should go beyond just the direct placement of fill or dredged material. Consideration of hydrologic disruption and or modification should be considered for both down and up stream and adjacent waters including wetlands. All stream crossing should be planned so as to minimize hydrologic influences by the project. Specifically, the project should not alter the up-stream or down-stream dimensions, pattern or profile of channels. EPA also recommends that no channelization occur and any realignment of streams or channels be done with hydrogeomorphic principals so as to construct a more nature stable channel. All practicable efforts should be made to avoid and minimize impacts and all remaining unavoidable impacts must mitigated for by developing and implementing an approved mitigation plan.